

July 19, 2024

Via ECF

The Honorable Frederick J. Scullin, Jr.
Senior United States District Court Judge
United States District Court for the
Northern District of New York
100 S. Clinton St.
Syracuse, NY 13261

Re: Joint Status Update Letter by All Parties in
DeAnna LeTray v. Jefferson County et al., Case No. 20-cv-01194

Dear Judge Scullin:

In response to the Court's Text Order on June 27, 2024, in the above-referenced case, all parties write jointly in advance of the telephonic court conference scheduled for Monday, July 22 at 1:30 p.m. to update the Court on the status of settlement.

The Plaintiff and City of Watertown Defendants have reached and signed a settlement agreement. The parties will file a Stipulation and Order of Dismissal as soon as the remaining paperwork is finalized.

The Plaintiff and Jefferson County Defendants have reached a settlement in principle where they have agreed upon a monetary amount and that Jefferson County will adopt certain policies and training. On June 28, 2024, Plaintiff's counsel provided Jefferson County Defendants' counsel with a draft Settlement Agreement. On July 2, Plaintiff's counsel provided Jefferson County Defendants' counsel with draft policy and training language. Jefferson County Defendants' counsel provided Plaintiff's counsel with a draft policy on July 18. Jefferson County Defendants and the Plaintiff now need additional time to finalize the policy and settlement language for the Jefferson County settlement but remain confident that a resolution will be reached.

While all parties remain available for Monday's telephonic conference, the parties now propose adjourning the conference until the week of August 5, 2024, with a status update letter due beforehand.

* * *

Respectfully submitted,

/s/ Jessica Perry

Jessica Perry
Robert Hodgson
Veronica Salama
Molly K. Biklen
NEW YORK CIVIL LIBERTIES
UNION
FOUNDATION
125 Broad Street, 19th Floor
New York, New York 10004
Tel: (212) 607-3300
Fax: (212) 607-3318
E-mail: jperry@nyclu.org

/s/ Joshua Cotter

Joshua Cotter
Samuel C. Young
LEGAL SERVICES OF CENTRAL
NEW
YORK, INC.
221 South Warren Street, 3rd Floor
Syracuse, New York 13202
Tel: (315) 703-6500
Fax: (315) 703-6520
E-mail: jcotter@lscny.org

Counsel for Plaintiff DeAnna LeTray

/s/ Jonathan Fellows

Jonathan Fellows
Collin Michael Carr
BOND SCHOENECK & KING, PLLC –
SYRACUSE
One Lincoln Center
Syracuse, NY 13202
E-mail: fellowj@bsk.com

*Counsel for Defendants City of
Watertown, Charles Donoghue,
George Cumming & Samuel White*

/s/ Kayla Arias

Kayla Arias
Brian Whiteley
BARCLAY DAMON LLP
Barclay Damon Tower
125 East Jefferson Street
Syracuse, New York 13202
Tel: (315) 413-7227
Fax: (315) 703-7306
E-mail: karias@barclaydamon.com

*Counsel for Defendants Jefferson
County, Colleen O'Neill, Kristopher M.
Spencer, Joel Dettmer, Deborah Davis &
Patrick Larkins*